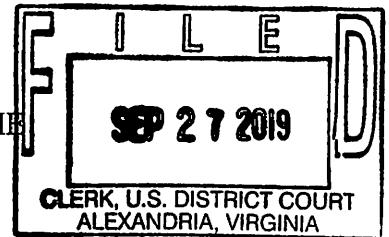


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA



Alexandria Division

UNITED STATES OF AMERICA)

v.)

) Criminal No. 1:19-MJ-420

ALEXUS JORDON,)

and)

) UNDER SEAL

EMMANUEL ETOO NDJONGO,)

Defendants.)

**AFFIDAVIT IN SUPPORT OF
A CRIMINAL COMPLAINT AND ARREST WARRANTS**

I, Tyler C. Mensing, being first duly sworn, hereby depose and state as follows:

1. I have been a Special Agent ("SA") with the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF") since October 2014. I am currently assigned to the ATF Washington Field Division's Group II. My assignments include conducting criminal investigations of individuals and entities for possible violations of federal laws, particularly those laws found in Title 18 and Title 21 of the United States Code. Since working for ATF, I have graduated from the Criminal Investigator Training Program and ATF Special Agent Basic Training in Glynco, Georgia. Prior to joining ATF, I was a Deputy United States Marshal with the United States Marshals Service for approximately four (4) years. Prior to that, I was a police officer with the Metropolitan Police Department of Washington, D.C. ("MPD") for approximately one and a half (1.5) years.

2. As an ATF agent, I have participated in investigations, which resulted in the arrests, searches, and seizures of individuals and property. I have participated in the use of cooperating informants, undercover agents, pen register/trap and trace devices, video surveillance, GPS tracking devices, search warrants, and audio surveillance, among other law enforcement techniques. Additionally, I have participated in numerous controlled buys of firearms and narcotics from targets of law enforcement investigations. I have also been involved in proactive and reactive cases. Based on my training and experience, I am familiar with the methods used in furtherance of a variety of criminal activities.

3. I submit this affidavit in support of a criminal complaint and arrest warrants charging Alexus JORDON (“JORDON”), and Emmanuel Etoo NDJONGO (“NDJONGO”) with making false statements with respect to the purchase of a firearm, in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

4. The facts and information contained in this affidavit are based upon my training and experience, personal knowledge, and observations during the course of this investigation, as well as information and evidence obtained from other agents involved in this investigation. All observations I did not personally make were related to me by the individuals who made them, or come from my review of records, documents, and other physical evidence obtained during the course of this investigation. This affidavit contains information necessary to support probable cause, and it is not intended to include each and every fact and matter observed by me or known to the government.

PROBABLE CAUSE

a. Purchase and Shipment of Firearms

5. On June 18, 2018, ATF SAs received information from the Washington-Baltimore Regional Crime Gun Intelligence Center (hereinafter “RCGIC”) concerning illegal firearms activity involving JORDON and began an investigation.

6. According to the RCGIC, All Shooters Tactical, a Federal Firearms Licensee (hereinafter “FFL”), located in Woodbridge, Virginia, within the Eastern District of Virginia, informed RCGIC that JORDON had purchased multiple firearms online from Classic Firearms, an FFL located in North Carolina, and had the firearms shipped to multiple FFLs in Virginia. The owner of Classic Firearms advised law enforcement that, on June 8 and 9, 2018, JORDON ordered eleven firearms from Classic Firearms and had them shipped to four different FFLs within the Eastern District of Virginia.

7. Further investigation revealed that, between March 21, 2018, and June 28, 2018, JORDON had purchased and/or picked up approximately thirty-two firearms from various FFLs within the Eastern District of Virginia. Specifically, JORDON used cash to purchase in-person five firearms from three FFLs within the Eastern District of Virginia. Using JORDON’s name, approximately twenty-seven other firearms were purchased online from Classic Firearms during approximately ten separate online transactions. Following the online purchase from Classic Firearms, these twenty-seven firearms were shipped to multiple FFLs within the Eastern District of Virginia. JORDON picked up or purchased in-person approximately twenty-five of the aforementioned thirty-two firearms from FFLs within the Eastern District of Virginia. The remaining seven firearms ordered and shipped under JORDON’s name from Classic Firearms were seized by ATF prior to JORDON picking them up from FFLs in the Eastern District of Virginia.

8. Concerned about the pattern of JORDON's online purchase activity, the owner of Classic Firearms spoke with JORDON and inquired why she was having the firearms shipped to multiple FFLs. JORDON explained to the owner that she had the firearms shipped to different FFLs because she liked to test the firearms out at the different shooting ranges at the FFLs. To follow-up on this statement, the owner of Classic Firearms called All Shooters Tactical, where JORDON had some of the firearms shipped, and spoke with a manager who informed him that All Shooters Tactical does not have a shooting range.

9. ATF obtained the billing invoices for JORDON's firearms purchases from Classic Firearms, each of which listed her billing address as being on Greenspire Way in Bowie, Maryland. Further investigation revealed that this Maryland billing address JORDON utilized for her Classic Firearms firearms purchases is the NDJONGO family address. These invoices also listed two phone numbers on the various purchase forms: (843) 864-7800, which is associated with JORDON in law enforcement databases; and (240) 472-7556, which is associated with NDJONGO on Facebook.

10. On the afternoon of March 21, 2018, JORDON and NDJONGO each filled out separate Range Safety waiver forms to shoot at the shooting range at Sharpshooters, an FFL located in Lorton, Virginia, within the Eastern District of Virginia. On his form, NDJONGO listed his phone number as (240) 472-7556 and supplied the Greenspire Way Bowie, Maryland address as his address. A couple hours after shooting on the range with NDJONGO, JORDON purchased a Glock pistol from Sharpshooters in-store with \$684.65 cash. Based on the timing of this purchase and a subsequent statement by JORDON to ATF SAs, there is probable cause to believe that NDJONGO was with JORDON at the time she purchased this firearm and that she purchased this firearm on behalf of NDJONGO.

11. On June 13, 2018, NDJONGO turned 21 years old. Therefore, at the time JORDON purchased twenty of the thirty-two firearms from FFLs, NDJONGO was not lawfully permitted to purchase the firearms himself from an FFL.

b. ATF Surveillance and JORDON Interview

12. On June 28, 2018, ATF surveilled JORDON while she picked up two firearms that were shipped from Classic Firearms to Parabellum Sports, an FFL located in Alexandria, Virginia, within the Eastern District of Virginia. Shortly after JORDON completed the transaction for the two firearms, ATF located JORDON's vehicle back at her residence on Dorset Drive in Alexandria, Virginia. After JORDON arrived at her residence, ATF knocked on the door of the residence and JORDON answered the door. JORDON consented to a voluntary interview with ATF agents.

13. During the course of the interview, JORDON showed SAs the two firearms she had just picked up from Parabellum Sports, one Taurus pistol and one AR-15 style rifle. JORDON admitted that she purchased these two firearms and other firearms for NDJONGO, with whom she was in a romantic relationship at the time. JORDON stated that she did not possess any other firearms at her residence.

14. JORDON further stated that she went to a shooting range with NDJONGO once and, subsequently, NDJONGO brought up the idea of JORDON purchasing firearms for him. JORDON explained that NDJONGO asked her to buy firearms for him because she was a Virginia resident and because firearms were easy to acquire in the state of Virginia. JORDON stated that NDJONGO lived with his parents at the aforementioned Greenspire Way, Bowie, Maryland address and that she knew NDJONGO was 20 years old. JORDON further stated that it was known on the streets that NDJONGO could provide firearms to people.

15. JORDON further stated that NDJONGO would sometimes travel with her when she picked up the firearms she purchased for him from FFLs. On the other occasions when NDJONGO was not with her to pick up the firearms, JORDON would later meet up with NDJONGO to give him the firearms.

16. JORDON explained that NDJONGO paid her \$420 car note in exchange for buying the firearms for him. JORDON further stated that the firearms that were shipped to Virginia were paid for online prior to JORDON picking them up in the store. When SAs explained to JORDON that the approximate total cost of the firearms she purchased was \$12,398.55, JORDON responded that she was a waiter and did not have that much money.

17. With respect to how the online purchases occurred, JORDON explained that NDJONGO would purchase the firearms from Classic Firearms online using JORDON's name. JORDON stated that she was not with NDJONGO when he placed the firearms orders online. JORDON further stated that she did not have a credit card and, thus, it was not her credit card that was used for these online purchases. JORDON showed SAs text messages on her phone from NDJONGO. One of the text messages was a screenshot of an email invoice from Classic Firearms sent from NDJONGO to JORDON. JORDON stated that Classic Firearms would email an invoice of the firearms purchases to her email account. JORDON explained that she would later receive a phone call from the FFL where the firearms were shipped notifying her to pick up the firearms.

d. ATF Interview of NDJONGO

18. During the execution of a residential search warrant at NDJONGO's Maryland residence, ATF recovered thirteen rounds of assorted ammunition and other firearms accessories from NDJONGO's vehicle. NDJONGO consented to a voluntary interview with ATF SAs and stated that he was involved in a romantic relationship with JORDON, and admitted that the

ammunition found in his car was his and that he left the ammunition in his vehicle after he went to a shooting range.

e. Preliminary Analysis of JORDON's E-Mail Account

19. A preliminary analysis of JORDON's Gmail account revealed that, on or about April 12 and 17, 2018, JORDON forwarded emails that she received from Classic Firearms, which included the tracking information for firearms shipments, to NDJONGO's email account.

20. In addition, on May 19, 2018, JORDON's Gmail account received a notification email from "Cash App" (an internet application where users can send and receive money from other user accounts) with respect to two money transfers sent that day to her from the Cash App account named "Emmanuel Etoo" and the user name "\$EmmanuelToo". The first transaction was for \$1,100 with a corresponding note stating "for real one". Then, approximately seven minutes later, the same account transferred JORDON \$90 with a corresponding note stating "for gas and loneliness".

21. Approximately two hours after receiving these two money transfers, JORDON utilized Cash App to purchase an FN, model FNS, .40 caliber pistol for \$528.94 from Vienna Arsenal, an FFL located in Vienna, Virginia, within the Eastern District of Virginia. Approximately two hours after the firearm purchase at Vienna Arsenal, JORDON again utilized Cash App to purchase a Springfield Armory, model XD Mod 2, .40 caliber pistol for \$475.82 from Quantico Tactical, an FFL located in Woodbridge, Virginia, within the Eastern District of Virginia. The total cost for the two firearms JORDON purchased from Vienna Arsenal and Quantico Tactical the day she received \$1,190 from Emmanuel Etoo's Cash App account was \$1004.76.

22. In addition, on May 24, 2018, JORDON's Gmail account received a notification that Cash App user "Emmanuel Etoo" transferred her \$360 with a corresponding note stating "for

profit". The day before, on May 23, 2018, JORDON picked up three firearms and a 100 round magazine from Elite Shooting Sports, an FFL located in Manassas, Virginia, within the Eastern District of Virginia.

f. Preliminary Analysis of JORDON's iPhone

23. A preliminary analysis of JORDON's iPhone, revealed several text message conversations between JORDON and NDJONGO concerning the purchase and sale of firearms, and obliterating serial numbers, including the following messages:

Party	Description	Party	Description
Incoming	1/16/2018 1:52:46 PM(UTC-5)	From: +12404727556 (JonJon)	Eben texted me telling me he wants to buy my uzi n that his manz got 900
Incoming	1/16/2018 1:53:04 PM(UTC-5)	From: +12404727556 (JonJon)	But I'm not selling mine so I passed it on to my boy
Incoming	1/16/2018 1:53:46 PM(UTC-5)	From: +12404727556 (JonJon)	To finesse them if he want sell a gun worth 600 for 900 or something but he likes robbing so
Incoming	1/16/2018 1:53:49 PM(UTC-5)	From: +12404727556 (JonJon)	Lls
Outgoing	1/16/2018 4:19:33 PM(UTC-5)	From: +18438647800	yeah and they trying to trade for a Mac you said???
Incoming	1/16/2018 4:22:07 PM(UTC-5)	From: +12404727556 (JonJon)	Nah they want a mac or an uzi
Incoming	1/16/2018 4:22:13 PM(UTC-5)	From: +12404727556 (JonJon)	We got all the guns
Incoming	4/17/2018 12:30:35 PM(UTC-4)	From: +12404727556 (JonJon)	But look they just sent me another AR pistol but for 400 this time
Incoming	4/17/2018 12:30:45 PM(UTC-4)	From: +12404727556 (JonJon)	Sounds like a sweet flip wat u think
Outgoing	4/17/2018 12:43:59 PM(UTC-4)	From: +18438647800	Yea it does .. how much would you let it go for?

Incoming	4/17/2018 12:44:12 PM(UTC-4)	From: +12404727556 (JonJon)	12
Outgoing	4/17/2018 12:57:18 PM(UTC-4)	From: +18438647800	Oh yeah a sweet flip
Incoming	4/17/2018 1:01:45 PM(UTC-4)	From: +12404727556 (JonJon)	Bet we in business
Incoming	4/17/2018 1:37:12 PM(UTC-4)	From: +12404727556 (JonJon)	You might have to send an ID pick again
Outgoing	4/17/2018 1:42:16 PM(UTC-4)	From: +18438647800	you bouta do the same place again?
Incoming	4/17/2018 1:42:43 PM(UTC-4)	From: +12404727556 (JonJon)	Of course not
Incoming	4/18/2018 12:50:12 PM(UTC-4)	From: +12404727556 (JonJon)	And the other one getting there tomorrow so let me know
Outgoing	4/18/2018 12:51:30 PM(UTC-4)	From: +18438647800	ok so you wan go tomorrow?
Incoming	4/18/2018 12:51:58 PM(UTC-4)	From: +12404727556 (JonJon)	If u up yeah
Incoming	4/18/2018 12:52:01 PM(UTC-4)	From: +12404727556 (JonJon)	It aint nothing
Outgoing	4/18/2018 12:53:43 PM(UTC-4)	From: +18438647800	Okay..
Incoming	4/18/2018 12:58:26 PM(UTC-4)	From: +12404727556 (JonJon)	Aight we live
Incoming	4/18/2018 12:58:49 PM(UTC-4)	From: +12404727556 (JonJon)	U said there's no more transfer fee?
Outgoing	4/18/2018 12:59:02 PM(UTC-4)	From: +18438647800	it's gone be like \$5
Incoming	4/18/2018 12:59:04 PM(UTC-4)	From: +12404727556 (JonJon)	N r u gonna have to fill them papers again?

Outgoing	4/18/2018 1:00:42 PM(UTC-4)	From: +18438647800	probably not I'm not sure
Incoming	4/18/2018 1:05:15 PM(UTC-4)	From: +12404727556 (JonJon)	U got 5 ima pay u back when I get them two off
Incoming	4/18/2018 1:05:22 PM(UTC-4)	From: +12404727556 (JonJon)	Lls
Outgoing	4/18/2018 1:06:29 PM(UTC-4)	From: +18438647800	yea I got five .. and pay me back what not no \$5 right, right
Incoming	4/18/2018 1:10:09 PM(UTC-4)	From: +12404727556 (JonJon)	This business expenditures we need to put it in the book
Incoming	4/18/2018 1:10:11 PM(UTC-4)	From: +12404727556 (JonJon)	Lls
Outgoing	4/18/2018 8:05:41 PM(UTC-4)	From: +18438647800	What you up to?
Incoming	4/18/2018 8:06:24 PM(UTC-4)	From: +12404727556 (JonJon)	Doing some magic
Incoming	4/18/2018 8:07:05 PM(UTC-4)	From: +12404727556 (JonJon)	With these serial

g. Recovery of Firearms purchased by JORDON

24. On or about February 6, 2019, Prince George's County Police Department officers recovered a Federal Armament pistol, in Upper Marlboro, Maryland, during the investigation of a drive by shooting incident. Law enforcement observed on the firearm that a punch had been utilized on the firearm in order to remove a digit in the serial number reflecting a serial number of P012*6 on the firearm. Analysis of the serial number on the firearm indicated that the missing digit in the serial number is likely a "3" or a "5". On or about May 10, 2018, JORDON purchased a Federal Armament pistol bearing serial number P01236 from All Shooters Tactical in Woodbridge, VA, located within the Eastern District of Virginia.

25. On or about June 24, 2019, officers of the Metropolitan Police Department (“MPD”) recovered a Ruger pistol in Washington, D.C. with an obliterated serial number. MPD’s Department of Forensic Sciences restored the serial number on the recovered firearm, which was traced back to a Ruger pistol JORDON purchased from Quantico Tactical, on May 3, 2018.

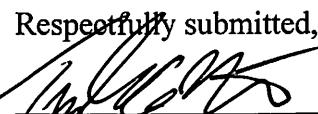
26. Based on my training and experience, the recovery of firearms purchased by JORDON outside the state of Virginia is indicative of an individual who is involved in firearms trafficking, and the removal of serial numbers from the recovered firearms is indicative of an individual attempting to conceal the identity of the original purchaser of the firearms.

27. Based on my training and experience, I know that the firearms discussed in this affidavit constitute firearms, pursuant to Title 18, United States Code, Section 921(a)(3), were not manufactured in the State of Virginia and, therefore, the firearms traveled in, and/or affected interstate commerce.

CONCLUSION

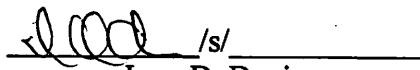
28. Based on the foregoing facts, I submit that there is probable cause to believe JORDON and NDJONGO made false statements in relation to the purchase of firearms on or about May 23, 2018, in violation of 18 U.S.C. §§ 924(a)(1)(A) and 2.

Respectfully submitted,



Tyler Mensing
Special Agent
Bureau of Alcohol, Tobacco, Firearms and
Explosives

Subscribed and sworn to before me
This 27th day of September, 2019.



/s/
Ivan D. Davis
United States Magistrate Judge